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Attorney for Michael Gerald Hammond

UNITED STATES DISTRICT COURT DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

v.

MICHAEL GERALD HAMMOND,

Defendant.

Case No. 2:18-cr-00059-KJD-DJA

STIPULATION TO CONTINUE PRELIMINARY HEARING (First Request)

IT IS HEREBY STIPULATED AND AGREED, by and between Jason M. Frierson, United States Attorney, and Justin Washburne, Assistant United States Attorney, counsel for the United States of America, and Rene L. Valladares, Federal Public Defender, and Katherine A. Tanaka, Assistant Federal Public Defender, counsel for Michael Gerald Hammond, that the Preliminary Hearing currently scheduled on June 22, 2023, be vacated and continued to a date and time convenient to the Court, but no sooner than one (1) week.

This Stipulation is entered into for the following reasons:

1. Counsel for the defendant is still waiting on discovery from the United States Probation Office supporting the violations.

| 1 | 2. The parties need additional time to discuss the violations and any potential | | |
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| 2 | resolutions. Undersigned counsel needs additional time to discuss Mr. Hammond's options | | |
| 3 | with him so that he can decide whether to waive or go forward with the preliminary hearing. | | |
| 4 | 4 3. Defendant is incarcerated and does | 3. Defendant is incarcerated and does not object to a continuance. | |
| 5 | 5 4. Additionally, denial of this reques | 4. Additionally, denial of this request for continuance could result in a | |
| 6 | miscarriage of justice. | | |
| 7 | 7 This is the first request for continuance fi | This is the first request for continuance filed herein. | |
| 8 | DATED this 20th day of June, 2023. | | |
| 9 | 9 | | |
| 10 | | JASON M. FRIERSON United States Attorney | |
| 11 | | Office States Attorney | |
| 12 | 2 By /s/ Katherine A. Tanaka | By /s/ Justin Washburne | |
| 13 | 3 KATHERINE A. TANAKA | JUSTIN WASHBURNE | |
| 14 | 4 Assistant Federal Public Defender | Assistant United States Attorney | |
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UNITED STATES DISTRICT COURT DISTRICT OF NEVADA

UNITED STATES OF AMERICA,
Plaintiff,
V.
MICHAEL GERALD HAMMOND,
Defendant.

Based on the Stipulation of counsel and good cause appearing,
IT IS THEREFORE ORDERED that the Preliminary Hearing currently scheduled on
June 22, 2023 at the hour of 3:30 p.m., be vacated and continued to July 5, 2023 at 3:30 p.m.

DATED this 20th day of June, 2023.

United States Magistrate Judge